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ABSTRACT

This paper discusses the policy environment in which data on race and ethnicity of college applicants are collected through a history of the federal collection of racial data, the current status of racial data collection, and the processes that led to current and proposed data collection requirements. The impact of recent changes in reporting categories on institutional data collection is described as illustrated by data from a preliminary study of current and planned data collection at a national sample of institutions. In fall 2002, data were collected from 127 institutions. Institutions were categorized into 2 categories: those that used the 1997 Office of Management and Budget Directive (OMB) 15 racial categories, and those that have implemented the 1997 revisions (among other changes, allowing the option of choosing more than one racial category) or have further expanded broad categories. Ninety-eight percent of the institutions collected racial and ethnic data on their applications for admission, and only two schools, both Historically Black Colleges and Universities, did not collect racial/ethnic data. Sixty-two percent of institutions currently use the "old" categories, and only 17.3% of institutions offered students the option of marking more than one category for race/ethnicity. The paper discusses the implications for practice and future research. An appendix provides a timeline of events related to development and implementation of OMB Directive 15. (Contains 4 tables and 30 references.) (SLD)

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Because the Numbers Matter: Transforming Racial/Ethnic Reporting Data to Account for Mixed Race Students in Postsecondary Education

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November 23, 2002

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Because the Numbers Matter: Transforming Racial/Ethnic Reporting Data to Account for Mixed Race Students in Postsecondary Education

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ASHE Annual Meeting
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In October 1997, the United States Office of Management and Budget (OMB) issued revisions to its Directive 15, changing the federal racial identification process to expand the number of racial categories and to include the option for respondents to indicate more than one race(OMB, 1997). The 2000 Census marked the first time in U.S. history that individuals had the option to self-identify in more than one of the five racial categories (American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White) in addition to indicating Hispanic or Latino ethnicity[1]. Of all respondents, 2.4% indicated more than one racial category; while these respondents represent a small minority of the total population, it is important for higher education policy that *4.0% of those under age 18* and *7.7% of those under age 18 reporting Hispanic or Latino ethnicity* indicated more than one category (U.S. Census Bureau, 2001). Without a change in data collection procedures, institutional record keeping based on the monoracial assumption that instructions to "check one box only" accurately capture racial demographics would soon be confounded by individuals for whom the one-box option is inappropriate. In fact, OMB mandated an immediate change in federal data collection and the full implementation of the change in data reporting by January 2003.

On the surface, the inclusion of an option to indicate more than one racial category seems a minor change in data collection, to be accomplished with a word processor and new forms; beneath this simple change lays a political minefield from institutional to national levels. It involves the National Center for Education Statistics (NCES) and the Office of Civil Rights (OCR), state legislatures and higher education coordinating boards, institutional policy and legal compliance, and a societal trend away from self-reporting racial and ethnic categories. Anticipating the challenge of implementing the changes and the political consequences of such changes (e.g. implications for congressional redistricting, incomparability of data pre- and post-revisions, etc.), representatives from a number of federal agencies have been working to develop guidelines for collecting racial and ethnic data under the revised standards, to create "crosswalks" from old data to new, and to keep stakeholders informed of the changes. Representatives of postsecondary institutions and organizations have been involved in the process, and the stakes for this constituency are high.

In a culture of legal challenges to affirmative action, racial statistics matter more than ever. The implementation of revisions to OMB Directive 15 could have a significant impact not only on how data are collected, but also on the numbers themselves. It is not clear that data collected before, during, and after the transition can be compared in any meaningful way, yet these data will become very important in assessing the impact on enrollments and graduation rates of various racial and ethnic group members of California's Proposition 209, the *Hopwood* decision in the fifth circuit, and the "One Florida" plan. In Adams-Fordice states, such as Oklahoma, that remain under court orders to comply with the Civil Rights Act of 1964 but receive less publicity than California, Texas, or Florida, the OMB's shift is considered premature (Stroup, 1998). Finally, there are questions about how the shift might run afoul of the Federal Educational Records Privacy Act (FERPA), in cases where individuals might be identified by a unique combination of race and ethnic categories. Clearly there is more at stake than revising and reprinting institutional forms to meet the new federal standards. Issues of *how* data collection will be transformed intersect with *what* the new data will say about the status of racial and ethnic groups in postsecondary education.

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[1] Definitions of "race" and "ethnicity" vary by source and interpretation. For the purposes of this paper we are using the federal governments terminology and categories (five races and two ethnicities), which we acknowledge to be highly contested constructs.

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In this paper, we discuss the policy environment in which data on race and ethnicity are collected through a history of federal collection of racial data, the current status of racial data collection, and the processes that led to current and proposed data collection requirements. We then describe the impact of the changes on institutional data collection as illustrated by data from a preliminary study of current and planned data collection practices at a national sample of institutions. Finally, we propose strategies for comparing data from before and after the change to multiple-race reporting and topics for future research in the area.

Policy environment in which data on race and ethnicity are collected

Background of federal collection of data on race and ethnicity

The U.S. Bureau of the Census has counted individuals by race since the 18th century, though definitions and methods of identifying members of racial categories have varied substantially over time (Lee, 1993; Spickard, 1989). Figures based on a complex system of labels for individuals with varying levels of black and white "blood" (e.g., "full-blooded Negroe," "mulatto," "quadroon," "octoroon"), all based on observation of skin tone, were admitted by the 1890 census report to be "of little value" (Spickard, 1989, p. 433, note 27). By the 1950 census this system had given way to three racial categories: White, Black, and Other (U.S. Census Bureau, 1957).

During the 1960s, the federal government began collecting racial data for reasons other than the decennial population count. Title VII of the Civil Rights Act of 1964 directed the Census Bureau to collect registration and voting information by race, color, and national origin, believed to be "the first Civil Rights era instance of Congress mandating the collecting of racial data" (Farley, 2001, p. 3). When in 1971 the Supreme Court required Charlotte Mecklenberg County to use racial ratios and busing to integrate public school students and teachers, it *de facto* required the collection of racial data (*Swann v. Charlotte Mecklenberg County*, 1971). The Department of Health, Education and Welfare (HEW) Office of Civil Rights was using Title IV of the Civil Rights Act of 1964 to collect information about the race of public school students. Title VII of the Civil Rights Act of 1965 established the Equal Employment Opportunities Commission, which required data on race and sex in order to insure employers' compliance. The test of compliance in employment and, often, in public education settings was the presence of black employees and/or students.

The 1970s brought additional changes to federal record keeping related to race and national origin. Increasing numbers of immigrants from nations other than those in Western Europe swelled the Asian, Caribbean, African and Latino populations; the 1970 census included a question to identify those whose descent was Mexican, Puerto Rican, Cuban, Central or South American, Other Spanish, or none of the above (Farley, 2001). The 1975 renewal of the Voting Rights Act of 1965 provided an opportunity for Latino activists to push for expansion of protected categories, and "language minorities" were added to include Asian Americans, Alaskan Natives, American Indians, and persons of Spanish heritage.

Prompted by Secretary Casper Wineberger of HEW, the Federal Interagency Committee on Education (FICE)[2] in 1973 began the process of creating government-wide standards for racial classification. In 1977 the Office of Management and Budget (OMB) issued Directive 15, which mandated that federal agencies gathering demographic data must use four major racial categories (White, Black, Asian or Pacific Islander, American Indian or Alaska Native), with only one per person. Spanish heritage (yes or no) was also to be determined for each individual, either by a separate question or as a fifth "racial/ethnic" category (OMB, 1977). A rider amended to a military appropriations bill by Congressman Robert Matsui delineated the Asian or Pacific Islander category on the 1980 census as Japanese, Chinese, Filipino, Vietnamese, Asian Indian, Hawaiian, Guamanian and Samoan (Farley, 2001).

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[2] FICE was established in 1964 by executive order (OMB, 1994, Background, ¶1), and members have included the Departments of Education, Agriculture, Commerce, Defense, Energy, Health and Human Services, Housing and Urban Development, Interior, Transportation, and Treasury, as well as a number of non-cabinet agencies (Army Information Paper, n.d.).

Recent history of the changes in Federal Standards for Racial and Ethnic Data Collection and Reporting (also known as OMB Directive 15)

A small but influential movement of multiracial individuals and parents of multiracial children emerged in the late 1980s and, motivated by the requirement to identify themselves and/or their children as "one race only" in the 1990 census, quickly drew attention in the media and from some key politicians. After working at the state level to add "multiracial" as a data collection category in Ohio, Illinois, and Georgia, activists began to address national data collection. A counter-movement immediately emerged from monoracial activist groups (e.g., National Urban League), and there began a serious debate about the potentially harmful effects of a separate multiracial category. The debate lasted through much of the 1990s and involved such unlikely advocates as House Speaker Newt Gingrich, in whose congressional district lived an influential white activist for adding a separate multiracial category. For a more complete discussion of the evolution and dissolution of the multiracial movement and the debate about adding a "multiracial" category to the census, see Farley (2001) or Williams (2000).

In 1993, OMB began a formal review of the standards for collecting, analyzing and reporting government data on race and ethnicity. In 1994, OMB created the Interagency Committee for the Review of Racial and Ethnic Standards (ICRRES), which represented more than 30 federal agencies. ICRRES was charged with making recommendations about how information on racial and ethnic backgrounds might more fully be collected and reported. The resulting OMB standards apply to "all federally collected data and reporting, including all levels of education, the national census, medical research, disease statistics, drawing boundaries for Congressional districts, the Voting Rights Act, and compliance with federal law and statutory regulations" (Davis-Van Atta, 1998, Summary, ¶ 3)

The new standards, published in final form in the *Federal Register* on October 30, 1997, included the change from five "acceptable racial and ethnic categories" (American Indian or Alaskan Native, Asian or Pacific Islander, Black, Hispanic, White) to "five minimum categories for data on race: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White" and "two categories for data on ethnicity: Hispanic or Latino, Not Hispanic or Latino" (OMB, 1997, Summary, ¶ 2). The new standards also stipulate that there be no "multiracial" or "multiethnic" option, but that respondents be offered the option of indicating more than one category. The preferred method of racial/ethnic data collection is through a two-question format that asks first about ethnicity, and then about race, though a one-question format is permissible. Self-identification is the preferred mode for collecting racial and ethnic data, though "observer-collected" data on race and ethnicity are permitted, in which case the observer should use six categories, combining the racial and ethnic categories as in the one-question format (OMB, 1997).

Reporting requirements were also changed, to include the minimum of reporting in the five racial groups and two ethnicities when data were collected by self-identification or the six racial/ethnic groups when data were collected by observation. In addition, "data producers are strongly encouraged to report detailed distributions, including all possible combinations, of multiple responses to the race question. If data on multiple responses are collapsed, at a minimum, the total number of respondents indicating more than one racial category must be provided" (NCES, 2000). OMB directed all changes to be effective "as soon as possible, but not later than January 1, 2003" (OMB, 1997, Effective Date, ¶ 1).

In February 1999, the Tabulation Working Group of the Interagency Committee for the Review of Standards for Data on Race and Ethnicity (formerly ICRRES, the group formed in 1994 whose recommended changes to the racial/ethnic data collection and reporting resulted in OMB's revision of Directive 15) issued *Draft Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity* (Tabulation Working Group, 1999). The final version of these guidelines was presented on December 15, 2000 as *Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity* (Tabulation Working Group, 2000).

Relationship of new requirements to collection and reporting of racial and ethnic data in postsecondary education

Although the new standards apply legally only to data collection and reporting by federal agencies, multiple interfaces among postsecondary institutions, related organizations, and the federal government all but mandate changes in institutional data collection and reporting.

> Not adopting the new methodologies at the institutional level would lead to fundamental incompatibility not only between one's institutional data and all federal data (e.g. census data, IPEDS [Integrated Postsecondary Education Data System] data), but to lack of comparability between institutions that have adopted the new standards and those that have not. Further, the result of not adopting the new standards would mean an inability to report institutional racial and ethnic data that more accurately reflect the U.S. population and would also forfeit an opportunity to provide prospective and current students, faculty, and alumni with options to capture for their [sic] racial and ethnic backgrounds more fully and accurately. (Davis-Van Atta, 1998, Implications for Institutions, ¶ 2)

Furthermore, it was expected that "adopting the new standards will result in not only new data, but also in a different structure for national and institutional databases" (Davis-Van Atta, 1998, Implications for Institutions, ¶ 3, emphasis in original). For example, rather than use a single data field with a limited set of single values to represent one racial/ethnic background per person, databases might have to include multiple permutations of possible racial/ethnic combinations, each with its own data field and dichotomous values. Overhauling institutional, state, and national databases to reflect the new OMB standards was predicted to be "likely to require considerable investment of both time and money" and "very different analytic treatment of racial and ethnic data, as well as of all other data associated with racial and ethnic backgrounds" (Davis-Van Atta, 1998, Implications for Institutions, ¶ 3).

Given the complexity of the tasks of complying with Directive 15 as revised by OMB (1997) and then bridging from old data to new, the National Postsecondary Education Cooperative (NPEC)[3], NCES, and the National Science Foundation (NSF) co-sponsored a Policy Panel on Racial/Ethnic Data Collection, which met March 17-18, 1998 and February 11-12, 1999, with recommendations issued in April 1999 (see Appendix for a Timeline of events involving changes to racial/ethnic data collection and reporting). The Policy Panel identified the two major changes as: "students and staff will be able to indicate if they are members of one or more races; and Asian or Pacific Islander racial category was split into two separate categories – 'Asian' and 'Native Hawaiian or Other Pacific Islander'" (Westat, 1999, p. 1). The purposes of the 1998 meeting were

> • To bring together appropriate organization representatives to decide how and when to implement the transition to the new Federal standards, and
> • To ensure that institutional researchers, admissions/registrars, and computer specialists at colleges and universities come to a consensus about the Federal collection of data in IPEDS. (p. 1)

The purposes of the 1999 meeting were

> • To review the draft OMB Tabulation Guidelines Report (and administrative data collections) and to provide comments to OMB;
> • To make final recommendations regarding the changes to the IPEDS survey forms, and the timing and process for implementing these changes; and

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[3] In 1994, Congress authorized NCES to form NPEC "to identify and communicate on-going and emerging issues germane to postsecondary education, and to promote the quality, comparability and utility of postsecondary data and information that support policy development, implementation and evaluation" (Bers, 1997, Summary, ¶ 1). NPEC is "a compact of co-equal partners of postsecondary education data users and providers" (Bers, 1997, Summary, ¶ 2), including "a broad spectrum of organizations and agencies representing all levels of postsecondary education that provide and/or use data: colleges and universities and proprietary institutions; state and federal government agencies; national associations; the media; accrediting associations; coordinating boards; and more" (Bers, 1997, Summary, ¶ 2).

> • To develop a plan to disseminate information to all stakeholders on the implementation of the new OMB racial/ethnic standards. (pp. 1-2)

Recommendations of the Policy Panel reflect the Draft Provisional Guidance (Tabulation Working Group, 1999), but not the final guidance document (Tabulation Working Group, 2000).

Based on the assumption that it would take two years to create and adopt appropriate software and two years to become consistent in collecting and maintaining racial/ethnic data across institutions, the panel predicted that "it would probably take institutions 4 years to have complete, consistent data, beginning from the time of their commitment to make the changes" (Westat, 1999, p. 5). Furthermore, in terms of readiness as of 1999 to comply with the revised OMB Directive 15, according to the Policy Panel report,

> Institutions of higher education are generally aware of the classification changes, but they are all waiting on official, definitive guidance from OMB and NCES before they begin implementing the changes. However, not all information technology staff are aware of these changes, especially since many institutions are focusing their technology resources on Y2K efforts. (Westat, 1999, p. 4)

So by February 1999, it was already fairly clear that it would not be possible for institutions to meet the Directive's January 1, 2003 deadline for implementation, even if guidelines for collecting and reporting racial/ethnic were immediately forthcoming from OMB.

Because of the central role of IPEDS in postsecondary data collection and reporting, a consensus emerged among higher education stakeholders (e.g., NCES, NSF, institutions, national testing organizations, etc.) that a planned redesign of the IPEDS survey could serve as both model and method for facilitating institutional conversion to the new standards. The Policy Panel recommended a timeline for transformation of the process, proposed to begin March 1999 with NCES issuing written recommendations from the Policy Panel and to end in fall of the 2002-2003 academic year with the IPEDS Fall Enrollment survey. The Policy Panel further recommended that "implementation of the changes should occur simultaneously in all institutions" (Westat, 1999, p. 9), with the exception of the Graduation Rate Survey, which should be phased in because of difficulty in ascertaining under the new standards the race/ethnicity of students who had left institutions prior to graduation.

Data collection. In response to Directive 15's allowance for a one- or two-question format for collecting data, the Policy Panel recommended the one-question format, unless states required the two-question format. Use of this format would result in six racial/ethnic categories: American Indian/Alaska Native, Native Hawaiian & Other Pacific Islander, Asian American, Black/African American, White, and Hispanic/Latino. The Policy Panel further recommended that institutions use eight data fields – these six categories plus a "bridge field" from the old coding scheme or the new data and a "flag field" to indicate whether the bridge field was from old or new data (1999, p. 6).

The NCES Taskforce for IPEDS Redesign (1999) ultimately recommended that institutions could choose either the one- or two-question format for obtaining race/ethnicity data and a modified version of the Policy Panel's two-table reporting format. The two-question format better meets the OMB requirement that ethnicity be reported independently from race and is posed as:

1. Which best describes you? (Choose one)
    a. Hispanic/Latino
    b. non-Hispanic/Latino
2. Which of these best describes your background? (Choose one or more)
    a. American Indian/Alaska Native
    b. Asian
    c. Black/African American
    d. Native Hawaiian/other Pacific Islander
    e. White

(NCES Taskforce for IPEDS Redesign, 1999, p. 25)

The one-question format is:

Which of these best describes your background? (Choose one or more)

a. Hispanic/Latino
b. American Indian/Alaska Native
c. Asian
d. Black/African American
e. Native Hawaiian/other Pacific Islander
f. White

(NCES Taskforce for IPEDS Redesign, 1999, p. 26)

In either case, institutions would have sufficient information to report respondents of a racial groups, multiple combinations of races, and either Hispanic/Latino or non-Hispanic Latino (either by choosing the appropriate response in the first question of the two-question format or by choosing or not choosing Hispanic/Latino in the one-question format). Both formats clearly meet the requirements of OMB Directive 15 (1997) for collecting data on race and ethnicity.

Data reporting. In response to the OMB Draft Provisional Guidelines (Tabulation Working Group, 1999) for reporting data, the Policy Panel recommended

> A new reporting format that includes a total of 17 columns in two tables. The first table consists of six categories of individuals reporting each race/ethnicity alone, Hispanic/Latino plus one or more races, and Non-Hispanic plus more than one race. This first table provides 'minimum/lower bound' count for each group. The categories for the first table are:
>
> - (1) All Non-Resident Aliens
> - United States Citizens and Permanent Residents Heading
>   - (2) Unknown Race/Ethnicity
>   - (3) American Indian and Alaska Native only
>   - (4) Asian American only
>   - (5) Black/African American only
>   - (6) Native Hawaiian & Other Pacific Islander only
>   - (7) White only
>   - (8) Hispanic/Latino only
>   - (9) Hispanic/Latino plus one ore more races
>   - (10) Non-Hispanic plus more than one race
> - (11) TOTAL (Computed field: sum of the above 10 columns)
> - *(11a) Total number reporting more than one race regardless of ethnicity. (NCES should only add this category if required by OMB.)*
>
> The second table includes six categories for individuals reporting each race/ethnicity alone and in combination with other categories. The second table provides a "maximum/upper bound" count. The categories for the second table are:
>
> - *Any* selection of race/ethnicity alone or in combination (U.S. citizens and permanent residents only)
> - (12) American Indian and Alaska Native
> - (13) Asian American
> - (14) Black/African American
> - (15) Native Hawaiian & Other Pacific Islander
> - (16) White
> - (17) Hispanic/Latino *(Computed field; sum of 8 and 9 above).*
>
> (Westat, 1999, pp. 10-11)

In essence, the first table provides an unduplicated count and the second allows for multiple counting of individuals who indicate more than one race. Through the second table, the framework allows mixed race individuals to have all of their races counted, but the first table fails to distinguish

among mixed race people in the two ethnicity categories (indicated in fields 9 and 10). Furthermore, both tables conflate the six OMB categories for race and ethnicity (i.e. there is no separate count of Hispanic/Latino and Not Hispanic/Latino by race).

Having recommended *either* the one- or two-question format, and noting that the answers to either would result in a "very large" number of possible race categories, the NCES Taskforce for IPEDS Redesign recommended

> that NCES adopt the 16 race/ethnicity categories recommended by the NPEC/NCES/NSF Policy Panel on Racial/Ethnic Reporting to report aggregated data for the Fall Enrollment Survey, the Completion Survey, the Fall Staff Survey, and the Graduation Rate Survey. These 16 categories are listed below.
>
> 1. Non-resident aliens
>
> U.S. citizens and resident aliens
>
> 2. Unknown race/ethnicity
> 3. American Indian/Alaska Native only
> 4. Asian only
> 5. Black/African American only
> 6. Native Hawaiian/other Pacific Islander only
> 7. White only
> 8. Hispanic/Latino only
> 9. Hispanic/Latino and one or more races
> 10. Non-Hispanic and more than one race
>
> Computed unduplicated total count (sum of 1 through 10 above)
>
> 11. American Indian/Alaska Native alone or in combination
> 12. Asian alone or in combination
> 13. Black/African American alone or in combination
> 14. Native Hawaiian/other Pacific Islander alone or in combination
> 15. White alone or in combination
> 16. Hispanic/Latino alone or in combination
>
> Categories 11 through 16 are for reporting maximum counts of individuals with a particular racial/ethnic background. For example, "white alone or in combination includes all individuals who report "white only" and white and any other race/ethnicity.
>
> (NCES Taskforce, 1999, p. 26)

Known as the "16-category framework," this recommendation, one of a number of recommendations made in August 1999 for revisions to IPEDS, was to be implemented as optional for institutions in 2000-2001 and 2001-2002, but required for all in 2002-2003.

<u>A hitch in the giddyup: The NCES 16-category framework is put on hold while an OCR format moves forward</u>

Only three months after the NCES Taskforce for IPEDS Redesign made its recommendations, which were in turn based on the recommendations of the NPEC/NCES/NSF Policy Panel, NCES alerted the postsecondary education community that "the status of the changes in race and ethnicity reporting that were to be implemented with the 2002 IPEDS Fall Enrollment Survey [were] currently being revisited" (What's New in Racial/Ethnic Reporting for IPEDS, 1999). According to the notice, the 16-category framework was being countered with "several alternative strategies for reporting aggregated race/ethnicity data…which might be more acceptable to the various federal civil rights agencies (e.g., the Office of Civil Rights and the Equal Employment Opportunity Commission) and/or the Office of Management and Budget" (What's New)[4]. As a result, NCES *was "strongly recommending that institutions do nothing at this time to*

[4] The 2000 update of *Provisional Guidance* (Tabulation Working Group, 2000) contains substantial requirements for the nature of tabulations (e.g., "data should be presented in as much detail as possible … subject to agency criteria for statistical reliability and confidentiality," and "to the extent possible, Federal agencies should report data using the same set of standardized

change their current race and ethnicity reporting systems and formats, but should wait until more definitive decisions on the direction of aggregate reporting of race and ethnicity have been made" (What's New, italics added). The notice went on to indicate that NCES had delayed plans to have draft IPEDS reporting forms available, would be meeting with OCR, and was urging OMB "to provide more guidance on this issue to the federal statistical community with the hope of getting some resolution to this situation as soon as possible" (What's New).

The abrupt halt to IPEDS revisions revealed a flaw in the apparently seamless development of new mechanisms for collecting and reporting data on race and ethnicity in postsecondary education. From the formation of NPEC in 1994 to the NPEC/NCES/NSF Policy Panel reports in 1998 and 1999, to the adoption of the 16-category format for reporting race/ethnic data by the NCES Taskforce on IPEDS Redesign, the progression of ideas and recommendations had proceeded smoothly, if not speedily. And because the Department of Education was a member of the OMB's Interagency Committee for the Review of Racial and Ethnic Standards (ICRRES), of which the proposal to revise Directive 15 was a product and whose work continued in the form of the Tabulation Working Group of the Interagency Committee for the Review of Standards for Data on Race and Ethnicity, it seems somewhat surprising that the Policy Panel and NCES Taskforce got as far as they did before learning of objections that would fully derail the process of adopting the 1997 revisions to Directive 15 in the postsecondary education sector.

In fact, the matter remains unresolved. In July 2002 the Association for Institutional Research (AIR) issues a briefing alert that included the following:

> The new federal guidelines will allow students and employees to indicate more than one racial category, using the following five categories as a minimum (more detail will be allowed within each category): American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian of Other Pacific Islander, and White. The American Indian or Alaska Native category has been changed to include individuals from South American and Central American countries. In addition, students and employees will choose one ethnicity using the following two categories as a minimum: "Hispanic or Latino" and "Not Hispanic or Latino." "Multiracial" or "Multiethnic" will not be acceptable response categories. The aggregate reporting requirements for individuals who choose more than one race have not been determined. (Sapp & Fuller, 2002a, Current Status)

The alert indicated that although various proposals have been offered for standards for aggregate reporting, "No decision has been made. Furthermore, a target date for such a decision has not been announced. *Until it is, institutions should not take any further action* (Sapp & Fuller, 1999, Summary, italics added). Specifically,

> Institutions should not make any further changes at this time in forms, databases, or computer programs until a final decision has been made. After the collection and reporting processes have been finalized by the federal government, collection instruments (e.g., for admissions, registration, and employees) will need to be updated, and students and employees may need to be re-surveyed. Changes will be needed in databases (allowing for all possible combinations of race and ethnicity categories), and computer programs used to generate reports will need to be updated. In addition, a mechanism for retaining "old" codes should be created for internal crosswalk purposes and for Graduation Rate Survey (GRS) cohorts that have matriculated but not yet reached 150% of normal time to award. Coordination among a number of offices (e.g., Admissions, Registrar, Human Resources, Information Technology, and Institutional Research will be necessary. (Sapp & Fuller, 2002a, Implications for Institutions)

Because of the extended timeline from adoption of new IPEDS requirements to institutional transformation (a total of four years, according to the NPEC/NCES/NSF Policy Panel), there was no possibility of meeting the January 2003 deadline for adoption of the changes to Directive 15.

The latest word (Sapp & Fuller, 2002b) indicates that the "deadline is no longer in effect" (Summary), aggregate reporting decisions have not been made, and "reporting for postsecondary

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categories to facilitate comparisons across subject-matter areas and data systems" [p. 48]) on pages 48-59.

institutions is currently 'on hold'" (Current Status). The new AIR alert ends: "Unknown – Date of a final decision on guidelines for IPEDS reporting and actual deadline for compliance with the new OMB standards on race/ethnicity" (Timeline, ¶ 2).

While the IPEDS proposal for a 16-category framework was put on hold, OMB issued a bulletin *Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement* (OMB, 2000) to assist various federal agencies in their efforts to work with data on race used in relation to civil rights. This bulletin was also incorporated in the *Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity* (Tabulation Working Group, 2000). It stipulates a framework for reporting race only (i.e. not including information on Hispanic/Latino ethnicity), including the five single races, the four most common double race combinations from the 2000 Census, any additional combinations that represent 1% or more of the population in a jurisdiction, and the balance of individuals reporting more than one race[5]. The bulletin provides this example:[6]

1. American Indian or Alaska Native
2. Asian
3. Black or African American
4. Native Hawaiian or Other Pacific Islander
5. White
6. American Indian or Alaska Native *and* White
7. Asian *and* White
8. Black or African American *and* White
9. American Indian or Alaska Native *and* Black or African American
10. > 1 percent: Fill in if applicable _____
11. > 1 percent: Fill in if applicable _____
12. Balance of individuals reporting more than one race
13. Total

(OMB, 2000, Aggregation Guidance, ¶ 2)

The specificity of the four most common combinations – as well as any others that might apply in particular circumstances – could not be met in aggregated data by the 16-category framework proposed by NCES, though it could be met at the individual respondent level. For example, a respondent who marks Asian and White would be counted in items 10, 12, and 15 of the NCES framework, and in item 7 of the OMB framework. But once the data from multiple respondents were aggregated at the institutional level, it would not be clear from the NCES table how to allocate those individuals in the OMB table. Asian-White mixes would be indistinguishable from other Asian mixes, and the presence of individuals indicating three or more races would further confound the data. This example illustrates the importance to of developing guidelines for aggregating data on race and ethnicity so that data can be compared within and across institutions and agencies. Though the OMB guidelines were imposed from outside the postsecondary

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[5] OMB (2000, Allocation Guidance, ¶ 1) also provided guidelines for the allocation of multiple race responses for use in civil rights monitoring and enforcement as follows:

- Responses in the five single race categories are not allocated.
- Responses that combine one minority race and white are allocated to the minority race.
- Responses that include two or more minority races are allocated as follows:
  - If the enforcement action is in response to a complaint, allocate to the race that the complainant alleges the discrimination was based on.
  - If the enforcement action requires assessing disparate impact or discriminatory patterns, analyze the patterns based on alternative allocations to each of the minority groups.

[6] Although the bulletin was issued before the four most common racial combinations could actually be determined from the 2000 Census, the combinations provided in the OMB example were, in fact, the four most common reported by census respondents. Therefore, the bulletin's example represents OMB's actual final guidance on the matter.

education data community, they provide a more clear system for obtaining an unduplicated count that captures more of the specific racial backgrounds of individuals than does the NCES 16-category framework and may ultimately prove more useful, especially if they are adopted as the standard by other agencies for reporting data on race.

Challenges for data analysis: Bridging old (1977) and new (1997) data formats

If the changes were only a matter of data collection and aggregate reporting, the delay in adopting them would not seem to be more than a bureaucratic inconvenience. But racial/ethnic data are needed to inform important public policy questions in a number of arenas, including higher education. The need to "provide the most accurate and informative body of data" to "those Federal Government officials charged with carrying out constitutional and legislative mandates, such as redistricting legislatures, enforcing civil rights laws, and monitoring progress in anti-discrimination programs" (Tabulation Working Group, 1999, pp. 8-9) is identified repeatedly in OMB documents related to the development of guidelines for implementation of revisions to Directive 15. And for the higher education community, the ability to compare data within and across institutions, state systems, and nationally is essential to understanding issues of access, equity, and success in the postsecondary education sector. As with proposals to collect and report data, proposals for bridging data have been put forward by a number of stakeholders, culminating in recommendations from the Interagency Committee for the Review of Standards for Data on Race and Ethnicity's Tabulation Working Group in *Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity* (2000). In this section, we briefly summarize these recommendations as they apply to postsecondary education data.

The Tabulation Working Group's guidelines provide for a "bridge period," during which agencies are permitted to use both the new data collected under the 1997 standards and a "bridging estimate," which is "a prediction of how the responses would have been collected and coded under the 1977 standards" (Tabulation Working Group, 2000, p. 85). This process allows for new data to be compared more meaningfully to the older format, though it does not attempt to estimate how old data might be seen under the new standards (which would not be possible, since respondents could indicate only one racial category and there is no way to determine how many individuals might have done so). In essence, the bridging estimates attempt to collapse the new data, with multiple race responses, into the old categories for race and ethnicity.

Several acceptable bridging methods were proposed, all of which involve the use of individual-level responses. The methods fall into two major types: "whole assignment," which places each individual into a single racial category, and "fractional assignment," which places individuals indicating more than one race into multiple categories (Tabulation Working Group, 2000, p. 87). Within whole assignment methods, individuals can be assigned on a deterministic set of rules (e.g., all White and Black/African American responses are assigned to the Black/African American category) or a probabilistic rule that randomly assigns a certain percent of multiple race responders to specific single race categories (e.g., 75% of White and Black/African American responders are assigned to Black/African American and 25% are assigned to White). A fractional assignment method could either assign a straight fraction of each response to the appropriate categories (e.g., a White and Asian respondent is assigned .5 to White and .5 to Asian) or in some ratio representing the amount of time that individual might identify with one group compared to another (e.g., a White and Asian respondent could be assigned .25 to White and .75 to Asian). Attempting to estimate how often an individual might identify with different groups is a messy and political business and therefore not likely to be incorporated often in strategies for reporting data on race and ethnicity.

Although whole assignment methods may be easier to manage statistically and fit better with a sense of one-body-one-response (avoiding the "half a person" effect of fractional assignment), they fail to meet a primary goal of the OMB's revision to Directive 15, the ability of respondents to self-identify. Fractional assignment promises to better meet this goal, although the identities of mixed race people are not necessarily well represented by simple division (see Renn, 2000; Rockquemore & Brunsma, 2002; Wallace, 2001). Allen and Turner (2001) offer strategies for fractional assignment based on 1990 census responses regarding ancestry. Allen and Turner's

strategies hold promise for those institutions that want to engage in probabilistic fractional assignment when reporting aggregate data while representing, to the best extent possible, the identities of mixed race respondents.

The NPEC/NCES/NSF Policy Panel recommended that NCES should build a 2-3 year bridge from new to old data, in part because a national bridge would be useful to institutions needing to bridge their own data. The need to bridge institutional data would continue unless and until institutions *resurveyed* continuing students for IPEDS compliance and staff for EEO reporting requirements; the Policy Panel therefore recommended, "institutions should be *strongly* encouraged but not required to resurvey continuing students" (Westat, 1999, p. 14). The Policy Panel further recommended that NCES should report data in only one format, that institutions report all data to NCES using only one format in a given year, that institutions should convert old data to the new format before reporting it, and that new data should be reported as new data rather than attempting to collapse it back into the old formats (p. 14). These recommendations were made with the recommendation that the 16-category framework be adopted and work less well with the 2000 version of *Provisional Guidance*, but they convey in clear terms the recommendation that NCES provide leadership to institutions in bridging between new and old data.

With the derailment of the plan for the 16-category framework and the subsequent silence from NCES regarding revisions to race and ethnicity data collected and reported for IPEDS, institutions are left with no additional guidance on collecting, reporting, or analyzing data. While this silence hardly represents a crisis of national policy, there are a number of important cases around the country that would benefit from resolution of this issue. Even where data on race and ethnicity are not evidence for public policy debates and civil rights monitoring, institutions attempting to track their own progress in terms of access, participation, and success across racial and ethnic categories wait in statistical limbo for guidance from NCES. In the next section, we present results of a study of current data collection and reporting practices at 127 institutions across the country.

Current practices in data collection and reporting: A preliminary study

Procedures

In the fall 2002 semester, we collected data on how institutions of higher education collect and report students' race and ethnicity. We randomly selected 10% of the Doctoral/Research Universities, Master's Colleges and Universities, and Baccalaureate Colleges under *The Carnegie Classification of Institutions of Higher Education* (public and private) and 5% of the public Associate's Colleges (Carnegie Foundation for the Advancement of Teaching, 2002). Our final sample was 5% (N=127) of our selected categories (15% of Research Institutions, 4% of Master's Colleges and Universities, 4% of Baccalaureate Colleges, and 4% of public Associates Colleges).

We obtained applications for undergraduate admission from sample institutions through the Internet, in portable document format (pdf) or an online version. If an application was not available from an institution's website, we contacted the office of admissions or institutional research via telephone or email to find out how they collected students' racial and/or ethnic information.

We also contacted institutions to find out what influenced their determination of racial/ethnic categories. We informed those we contacted that we were exploring trends in how schools collect and report student radial/ethnic categories. Lastly, we collected the percentage of students of color per institution. This was also collected through institution's websites or via telephone.

For the purpose of this study, we categorized institutions into 2 groups based on how students' race and ethnicity was collected and reported. The "old" category includes institutions that use the 1977 OMB Directive 15 racial categories, which include: American Indian or Alaska Native, Asian or Pacific Islander, Black, and White (single selection only, sometimes including Hispanic/Latino as an additional category). The "expanded" category includes institutions that have implemented the 1997 revisions to OMB's Directive 15 (at a minimum) and/or have further expanded broad categories (e.g., one institution expanded its old "Asian or Pacific Islander"

category into 10 new categories: Chinese, Japanese, Korean, Asian Indian, Other Asian, Laotian, Cambodian, Other Southeast Asian, Thai, and Vietnamese).

For data analysis, the institutions were further categorized into 8 regions of the U.S. (see Table 1). Data were analyzed by Carnegie classification, region, institutional type (public versus private), and the percentage of students of color per institution.

Demographics of the sample

One hundred twenty seven institutions were part of this study (see Table 2). By Carnegie classification, 22 schools (17.3%) were Doctoral/Research Universities-Extensive, 16 (12.6%) were Doctoral/Research Universities-Intensive, 22 (17.3%) were Master's Colleges and Universities I, 4 (3.1%) were Master's Colleges and Universities II, 14 (11.0%) were Baccalaureate-Liberals Arts Colleges, 8 (6.3%) were Baccalaureate-General Colleges, and 41 (32.3%) were Associate's Colleges. Ninety-two (72.4%) were public institutions and 35 (27.6%) were private. Fifteen percent of the institutions were in region I, 3.9% were in region II, 11.8% were in both regions III and IV, 17.3% were in region V, 7.9% in region VI, 12.6% in region VII, and 19.7 in region VIII.

Findings

Ninety eight percent of the institutions collected racial/ethnic data on their application for admission. The remaining schools reported that they collect the information when students register for courses. Only 2 institutions did not collect racial and/or ethnic data via application for admission. Both of these schools were Historically Black Colleges or Universities.

Overall, most institutions have not yet implemented the 1997 revisions to OMB's Directive 15 or expanded the 1977 racial/ethnic categories. Sixty-two percent of institutions currently use the "old" reporting categories. The reporting categories varied by Carnegie classification, region, and institutional type.

Collecting and reporting differences by Carnegie classification. Doctoral/Research Universities-Extensive was the only Carnegie classification that had more institutions that collected racial/ethnic data using the "expanded" categories than those using the "old" categories (54.5% to 45.5%, respectively). The Doctoral/Research Universities (both extensive and intensive) had the highest percentage of institutions that have implemented changes to the 1977 categories, where almost half (47.4) fall under the "expanded" category. Liberal Arts colleges ranked second in institutions that have expanded their categories, however less than half (42.9%) have implemented changes. Master's Colleges and Universities II had the most institutions still collecting data under the 1977 OMB categories (75%). In the remaining Carnegie classifications, roughly two-thirds of the institutions use the "old" categories (see Table 3). Although these trends may indicate important variations across the Carnegie classifications, no statistically significant differences were found in data collection and reporting.

Collecting and reporting differences by Region. The most significant differences between institutions reporting under the old versus expanded categories were by region. Regions II, V, and VII had the largest percentage of institutions who use the expanded categories, with 60%, 54.5%, and 72% respectively (see Table 3). In region III, 93.3% of institutions use the 1977 categories. Collecting and reporting differences by region were significantly different ($p = .000$).

Collecting and reporting differences by type. The majority of both public and private institutions collected data under the old categories (59.8% and 68.6% respectively), with no statistically significant difference found by institutional type.

Collecting and reporting differences by racial composition of student body. There was also no statistically significant difference related to racial composition of student body. The average percent of students of color at institutions using the old categories is 20.7, while the percentage of students of color at those that use the expanded categories is 22.4.

Explanations for decisions to change or not change collecting/reporting categories. We also explored in a preliminary fashion why institutions have or have not made changes to their racial/ethnic collecting categories. The vast majority of the categories used by institutions are guided by IPEDS. Institutions that have expanded categories beyond those in the 1997 revision to Directive 15 have done so to be more inclusive of the demographic of their student population. For

example, 2 institutions located in the same region had a "Cape Verdean" category to better represent their local community and student body.

Although institution expanded the categories for data collection, they typically collapsed the categories back to the single, "old" categories on publicized institutional reports as observed on institutional websites. The California State University (CSU) system is an example of a single system that has strategically created categories to be easily collapsed for IPEDS reporting, yet it strives to represent student demographics at individual campuses. The CSU system uses the *CSU Mentor* for application to any CSU institution. The applications has one set of 27 options for students to chose their "ethnic identity." These data are collapsed into nine categories for the CSU system Statistical Reports, and are further collapsed into five categories for IPEDS reporting (The California State University, 2002, see Table 4). Individual campuses report data (collapsing ethnicities into different categories) based on their student demographics and institutional preference.

In exploring the websites of individual institutions in the CSU system, there are variations of how this data is reported per institution. Individual campuses report data (collapsing ethnicities into different categories) based on their student demographics and institutional preference.

Discussion

Although there are differences in how institutions collect and report racial and ethnic data by Carnegie classification, region, and type, the overall finding that 62.2% of institutions had not yet implemented OMB's 1997 revisions to its Directive 15 is striking. The Policy Panel estimated that it will take institutions four years for institutions implement changes to their methods of data collection (Westat, 1999). After five years after OMB issued the 1997 revisions to the standards for data collection and reporting, less than 40% of institutions have made changes. In addition, only 17.3% of institutions in our study offered students the option of marking more than one category for race and/or ethnicity (depending on the one- or two-question format) – a critical element of the new standards. Four out of five institutions will have to make this substantial change in the near future in order to comply with Directive 15.

NCES recommended that institutions not change their current race and ethnicity reporting systems, but rather wait for a definitive decision from the federal government (What's New in Racial/Ethnic Reporting for IPEDS, 1999). The majority of the institution that we contacted reported that they are waiting for instructions from IPEDS administrators at NCES to make any changes to the categories used to collect student racial/ethnic data, as advised by OMB (Westat, 1999). While we applaud the willingness of institutions to hold off individual changes in anticipation of guidance from NCES, we are concerned that the spirit of the OMB directive, which could have been honored at the institutional level, has been set aside in favor of bureaucratic processes.

Implications, limitations and recommendations for future research

Implications and recommendations for postsecondary education

It is clear that higher education is in the early process of a major change in policies and procedures surrounding the collection, analysis, and reporting of data related to race and ethnicity. It is also clear that the postsecondary sector will not meet the January 1, 2003 deadline of the OMB's 1997 Directive 15. The consequences of missing that deadline do not appear dire; there is nothing in the directive and no indication elsewhere that institutions or agencies will be penalized for failing to meet this deadline. Given the advance time required to implement such a shift in educational institutions (estimated at four years by the NPEC/NCES/NSF Policy Panel), it would have been a fairly close call to implement the changes in any case, but the apparent disconnect between NCES and other stakeholders rendered the task unfeasible by January 2003. And although the deadline will have come and gone without systemic changes in postsecondary data collection and reporting, the changes are inevitable and will impact data at the institutional, state, and national level.

Decisions about data collection seem reasonably solid; there has been no public discussion of changing from the option of a one-question or two-question format for collecting data from students and employees. These formats are compatible with the 2000 Census and should yield data that can be made comparable across data from a number of federal sources. It is not clear whether or not institutions will be *required* to re-survey all students and employees. We anticipate that the number of individuals who refused to answer would be significant and could have an adverse effect on the value of data collected. Still, a requirement to re-survey could provide valuable information for institutional data bridging purposes and we concur with the NCES Taskforce on IPEDS Redesign that institutions should engage in this process. Students could be required to re-identify themselves (or to indicate that they decline to identify themselves) prior to registration and employees could be required to do so as a condition of employment, perhaps in conjunction with annual benefits review and subscription. At many institutions, an online process would not be difficult to implement or manage.

The current situation for data collection, as evident through our survey of 127 institutions, is nearly consistent in timing of data collection (all but two collect from students on application and do not re-survey), but quite divergent in how questions are asked, how many responses students may supply, and what categories are available. While there will certainly remain some diversity among categories available, standardization of how the information is requested will be an asset to the data community, institutions, and students themselves. Institutions have by and large heeded the NCES call to stay the course and have not changed questions in anticipation of the new standards; indeed the vast majority still requires students to indicate only one racial category. While we are somewhat frustrated with the resistance to adopting a multiple response option, at this time we believe that the interest in consistency in data collection outweighs the interests of individual respondents and, perhaps, political activists seeking information on multiple responders.

Data aggregation and reporting, however, represent much more complex tasks that must be coordinated within and across institutions. Comparability of data is critical to conducting peer analyses; to analyzing institutional, systemic, and national trends; and to Civil Rights monitoring and enforcement. Two options are currently in discussion in the postsecondary education community – the 16-category framework and the OMB Civil Rights format. Although there are certainly other formats for reporting data, we will discuss the strengths and weaknesses of these two.

The OMB format has been adopted and is in use nationally; there are strong arguments for having postsecondary data reported in this format. It facilitates comparisons across agencies and purposes; it is a fairly straightforward approach that includes an unduplicated count; it can be adapted to specific populations whose racial combinations may vary from the national norm; it provides specificity in racial combinations in ways that the 16-category framework does not. Furthermore, bridging from pre-1997 data is not terribly complicated using this format. What it lacks, however, is any accounting for ethnicity. It is a race-only framework that requires additional tabulation to indicate Latino or Hispanic heritage. It also fails to recognize the specific combinations of races falling below one percent of the total, which while not appearing to be a significant disservice to individuals does violate the "self determination" philosophy of OMB Directive 15 (1997). While OMB very clearly stated that this framework was for the purposes of Civil Rights monitoring and enforcement only, the adoption of this policy across agencies indicates that it will be a presence and a precedent for federal agencies.

The NCES 16-category framework could still be adopted for IPEDS and other purposes. It is especially useful to higher education because it includes non-resident aliens, who constitute an important segment of the postsecondary population; it includes an "unknown" category, which can be important in understanding the relative proportion of other individuals counted; and it includes ethnicity. Although somewhat bulky, the combination of unduplicated total (lines 1-10) and duplicated figures (lines 11-16) provides a more accurate picture of campus populations and, more so than the OMB unduplicated format, meets the spirit of self-determination. What it lacks, though, is specificity. It is not clear from this framework how many of the "_____ alone or in combination" respondents are "in combination" with other specific races. There is no way without examining individual records to determine the number of, for example, Asian-White respondents.

On some campuses, this information could be important, as could the ability to compare this information across institutions, especially within state systems.

Although neither is perfect, and there are undoubtedly other models, we recommend the adoption of the OMB model. It includes more specificity than the NCES framework, it is less confusing than the unduplicated-duplicated dual system, and from it the duplicated information could easily be constructed if it were of interest. We recommend, however, that the OMB model be modified to include Hispanic/Latino as an equal category to the five "races" and to include Hispanic/Latino as appropriate in the four most common combinations reported in the table. Because 7.7% of those under age 18 indicating more than one race also reported Latino or Hispanic ethnicity (U.S. Census Bureau, 2001), it is critical to provide a means to express this identity in educational demographics. Our recommendation challenges OMB's differentiation between race and ethnicity and, although we again acknowledge the contested nature of the discussion, asserts that the lived experience of students identified as Latino or Hispanic constitutes that on par with students identified with so-called racial groups.

Current practices vary widely, with no consistent method for institutional presentation of data outside the IPEDS process. Even within systems that collect data through common admissions applications (e.g., the California State Universities), data presentation is inconsistent. There will always be reasons for institutional variation in data presentation, and some institutions will want to present far more detail than the 16-category or OMB formats. We recommend, however, that institutions make available data in whatever format is adopted by IPEDS, as well as institutional reporting formats, with information on how individuals who indicated more than one race were assigned to categories (if this is not apparent from the final model adopted by IPEDS). At present, it is difficult to compare data across institutions from information available publicly. And it is even more difficult to determine how multiracial individuals are represented in the data presented.

Recommendations for bridging and analyzing data hinge in part on the framework adopted for aggregation and reporting. Some important philosophical elements, however, apply to any plan for bridging old and new data. These bridge calculations involve highly charged political stakes and personal identities, as the process essentially involves re-assigning individual responses from the categories indicated by individuals into the "old" single response categories.

As Allen and Turner (2001) indicate, there are a number of ways to assign the responses of mixed race individuals to single categories that are acceptable under the OMB's *Provisional Guidance* (Tabulation Working Group, 2000). We are least comfortable with "whole assignment" models that call for unilateral assignment of all individuals with White and other racial heritage into the category of that other race. This is, in fact, the OMB's method in Civil Rights monitoring and enforcement calculations, and we are troubled by the ways this model inflates the number of people in racial categories other than White, no matter how those individuals might look, feel, or act.

We support Allen and Turner's (2001) recommendations for "fractional assignment," although in responding to the individual's right to self-determination they interfere somewhat with the institution's need to have data that are readily analyzed by whole numbers. If institutions adopted an overlapping data collection process (e.g., collecting data with "old" and "new" questions for a few years), an institution-specific scheme for fractional assignment could be determined that would account for regional racial and ethnic history and trends in self-determination. In the absence of the resources or will to conduct such a bridging study, many institutions could rely on Allen and Turner's work for guidance on fractional assignment. Once the final IPEDS categories are established, this issue should be revisited for further clarification.

Limitations of this project

Our paper represents two strands of work on the topic of postsecondary data collection and reporting as related to race and ethnicity. Each is limited in some way by information available and research design. While we cannot address all of the limitations, seen and unseen, of our work, we will attempt to raise issues that we believe should be considered when reading the paper.

With regard to the study of the process of changing racial and ethnic data collection and reporting, our study is limited in part by access to relevant information. In choosing a broad historical approach, we elected not to conduct in depth interviews with individual participants in the

change process. Such a process might have yielded additional depth of insight into stakeholder concerns and political processes, as well as filling in gaps that were not covered in documents available publicly. Conversely, by delimiting the study to agencies most directly associated with postsecondary education, we may have missed some important information about the overall approach taken by federal agencies. Inevitably, a broader net would have caught different, if not more, information. As in any study, balancing questions of depth and breadth of scope limited the outcomes.

With regard to the study of current data collection and reporting practices, our study is limited somewhat by the sample. Although 127 institutions provides a reasonable basis for understanding trends among current practices, a larger sample would permit more comparisons across institutional type, region, and Carnegie classification. The sample is also somewhat confounded by the presence of institutions from state systems, many of which have the same policies for collecting and reporting data. So two institutions that use the same data collection practices might do so because they have made independent decisions to do so, or they may be mandated to do so by system policy. Both cases are interesting and informative, but their meaning in the larger sample is different. A sampling scheme that accounted for such circumstances would strengthen the findings.

Recommendations for future research

We are left with a number of questions and a number of suggestions for future research in each of the study's areas. And, of course, we are eager to see what will happen when NCES issues final recommendations for IPEDS revisions in the area of race and ethnicity. The research represented in this paper could be expanded in a number of interesting ways, some of which we suggest here.

First, an in depth qualitative study of the change process would be useful and interesting. More information on decisions within the NPEC/NCES/NSF Policy Panel and the NCES Taskforce on IPEDS Revision could reveal insights into political processes and stakeholder influences. How, for example, was the 16-category framework developed, whom would it benefit, and why was it abandoned? Can a resolution be reached that meets the same needs yet also meets OMB and other agency concerns and mandates? How can we avoid similar situations (such as developing and then abandoning a solution) in the future? After NCES issues new IPEDS guidelines, a follow up study to see how these guidelines were ultimately developed and are being received by a number of stakeholders would be in order.

A broader study, placing the postsecondary data community in the context of a larger federal data community could also be useful in understanding how postsecondary education is seen and how it might exert its influence at the federal level. Certainly every agency within the government, and the many external constituencies that must collect and report data on race and ethnicity, are affected by OMB Directive 15 (1997). Whose concerns are being heard most clearly? How do their concerns match – or conflict with – those of higher education? Should we be forming alliances differently to achieve mutually beneficial outcomes? How might we do so? A thorough document review of other agencies' processes related to Directive 15, and then interviews with key informants, could provide useful information for future decision making around interagency initiatives and cross-agency mandates. And once the changes are in place, a thorough review of the place of NCES and NPEC in the final decision would be instructive as well.

With regard to current practices for data collection and reporting, there are a few questions that would benefit from additional research even before changes are finalized. For example, why have some institutions changed from "old" to "new" and/or "expanded" data collection? What forces operate on institutions to cause them to make these changes? How do institutions respond to local constituencies in this regard? How are they aggregating and reporting data that do not fit the prescribed IPEDS categories?

Once changes are mandated, a follow up study of how institutions ask for data on race and ethnicity (the one- or two-question format or other variation), as well as how they aggregate and report data would be important to understanding the national picture of data collection and reporting. It may be the case that after the changes are made, data remain incomparable across

institutions, systems, and states. While many data analysis needs can be met without exactly comparable data, the needs of the postsecondary community and the public may not be best served if data cannot be aligned for easy comparison.

The issue of bridging will require further research to ascertain the effectiveness of different proposed bridging methods. The ability to compare old and new data sets for purposes of tracking access, retention, and completion is critical. The ability to compare trends across broad historical timeframes is already impeded by inconsistent data collection methodologies and terminologies, but it will be impeded further by inconsistent bridging practices. It will be important to examine bridging proposals and then actual bridging practices to determine the viability and effectiveness of various methods.

Conclusion

At the outset, we stated that when it comes to data on race and ethnicity in higher education, "the numbers matter." The numbers matter at the individual, institutional, state, and federal levels. The ability to track access, retention, completion, and employment by race and ethnicity is important as our loosely coupled "system" of postsecondary education attempts to meet educational, workforce, and research needs of a nation that is changing rapidly in terms of demography and economics. At a time when some institutions have abandoned (or been forced to abandon) Affirmative Action, others are still under legal orders to meet racial desegregation mandates; the ability to assess the impact of the former and progress toward the latter depends on the reliability of data collection and reporting across time. While OMB's Directive 15 (1997) was an important step toward allowing individual self-determination of multiple racial categories, it came at a time when the reliability of racial data was more important than ever in postsecondary education.

The outcomes of the changes remain to be seen. It is not clear how or even when Directive 15 will be fully implemented in higher education. While we are hopeful that this change will provide an impetus for higher education institutions to align themselves fairly uniformly with whatever new guidelines IPEDS requires, we are even more hopeful that institutions will voluntarily adopt some uniform means of collecting and reporting data. Where they choose to be more descriptive than required by IPEDS (e.g., the California State University system), we hope that they will be explicit about how they are collapsing data into IPEDS categories so that comparisons across categories can be made easily by any interested party. Most of all, we are hopeful that the current change process, bureaucratic and incomplete as it may now be, might serve as a model for future changes to data collection – changes that will almost surely be required as the U.S. population continues to become more diverse and less easily confined to "one box only."

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Appendix

Timeline of Events Related to Development and Implementation of OMB Directive 15 and Subsequent Revisions

1973: HEW Secretary Casper Wineberger asks the Federal Interagency Committee on Education (FICE) to begin process of creating government-wide standards for racial classification

1977: Office of Management and Budget (OMB) issues Directive 15, mandating that federal agencies gathering demographic data use four major racial categories (White, Black, Asian or Pacific Islander, American Indian or Alaska Native). Spanish heritage (yes or no) was also to be determined for each individual.

1980: U.S. Census also includes a delineation of the Asian or Pacific Islander category as Japanese, Chinese, Filipino, Vietnamese, Asian Indian, Hawaiian, Guamanian, and Samoan

1993: OMB begins formal review of standards for collecting, analyzing, and reporting federal data

1994: OMB creates Interagency Committee for the Review of Race and Ethnic Standards (ICRRES), representing over 30 federal agencies

October 1997: OMB issues revision to Directive 15; changes from "five acceptable racial and ethnic categories" to "five minimum categories for data on race: American Indian or Alaskan Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White" and "two categories for data on ethnicity: Hispanic or Latino, Not Hispanic or Latino)." There is no Multiracial or Multiethnic option, but respondents must be offered option of indicating more than one racial category; mandated to take effect for Census 2000 and for all federal data by January 1, 2003

March 1998: National Postsecondary Education Cooperative (NPEC), National Center for Education Statistics (NCES), and National Science Foundation (NSF) sponsor first meeting of a joint Policy Panel on Racial/Ethnic Data Collection (Policy Panel)

February 1999: Policy Panel holds second meeting

February 1999: Tabulation Working Group of Interagency Committee for the Review of Standards for Data on Race and Ethnicity (formerly ICRRES) issues *Draft Provisional Guidelines on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity* for comment and review by interested parties and agencies

April 1999: Policy Panel issues final report, including the 16-category framework for reporting data on race and ethnicity; recommendations incorporate recommendations of Tabulation Working Group's *Draft Provisional Guidance* report

August 1999: NCES Taskforce for IPEDS Redesign accepts 16-category framework and recommends it for use in IPEDS data collection and reporting

November 1999: NCES puts hold on recommendation for 16-category framework and tells institutions not to make any changes until additional guidance is forthcoming from federal government

March 2000: OMB issues bulletin on the collection and reporting of racial data for Civil Rights monitoring and enforcement; contains a format for reporting race that is incompatible with NCES 16-category framework

December 2000: Tabulation Working Group issues *Provisional Guidelines on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity;* includes the March 2000 OMB format for reporting race

July and August 2002: Postsecondary Statistics Division of NCES informs postsecondary education community that "the status of the changes in race and ethnicity reporting that were to be implemented with the 2002 IPEDS Fall Enrollment Survey is currently being revisited," and "is strongly recommending that institutions do nothing at this time to change their current race and ethnicity reporting systems and formats." January 1, 2003 deadline no longer applies.

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TABLE 1. Regions

Region I	Region II	Region III	Region IV
Connecticut	Delaware	Kentucky	Alabama
Maine	West Virginia	Maryland/DC	Arkansas
Massachusetts	Pennsylvania	North Carolina	Florida
New Hampshire		South Carolina	Georgia
Rhode Island		Virginia	Mississippi
Vermont			Tennessee
New York			Louisiana
Region V	**Region VI**	**Region VII**	**Region VIII**
Illinois	Iowa	Arizona	Alaska
Indiana	Kansas	Colorado	California
Michigan	Minnesota	Montana	Hawaii
Ohio	Missouri	New Mexico	Idaho
Wisconsin	Nebraska	Texas	Nevada
	North Dakota	Utah	Oregon
	South Dakota	Wyoming	Washington
	Oklahoma		

TABLE 2. Demographic Characteristics of Institutions (N=127)

Characteristic	n	% of N
Carnegie Classification		
Doctoral/Research Universities-Extensive	22	17.3
Doctoral/Research Universities-Intensive	16	12.6
Master's Colleges and Universities I	22	17.3
Master's Colleges and Universities II	4	3.1
Baccalaureate Colleges-Liberal Arts	14	11.0
Baccalaureate Colleges-General	8	6.3
Associates Colleges	41	32.3
Region		
I	19	15.0
II	5	3.9
III	15	11.8
IV	15	11.8
V	22	17.3
VI	10	7.9
VII	16	12.6
VIII	25	19.7
Type		
Public	92	72.4
Private	35	27.6
Data Collection/Reporting Categories		
Old	79	62.2
Expanded	48	37.8

TABLE 3. Data Collection/Reporting Category by Demographic

Data Category	Old		Expanded		p
	n	% of category	n	% of category	
Carnegie Classification					
Doctoral/Research Universities-Extensive	10	45.5	12	54.5	.672
Doctoral/Research Universities-Intensive	10	62.5	6	37.5	
Master's Colleges and Universities I	15	68.2	7	31.8	
Master's Colleges and Universities II	3	75.0	1	25.0	
Baccalaureate Colleges-Liberal Arts	8	57.1	6	42.9	
Baccalaureate Colleges-General	5	62.5	3	37.5	
Associates Colleges	28	68.3	13	31.7	
Region					
I	12	63.2	7	36.8	.000*
II	2	40.0	3	60.0	
III	14	93.3	1	6.7	
IV	13	86.7	2	13.3	
V	10	45.5	12	54.5	
VI	8	80.0	2	20.0	
VII	13	81.3	3	18.8	
VIII	7	28.0	18	72.0	
Type					
Public	55	59.8	37	40.2	.361
Private	24	68.6	11	31.4	

Note. *p<.001.

TABLE 4. Race/Ethnicity Collection and Reporting of the California State University System

Application for Admission	CSU System Statistical Reports	IPEDS
African American	African American	African American
American Indian	American Indian	American Indian
Chinese Japanese Korean Asian Indian Other Asian Laotian Cambodian Other Southeast Asian Thai Vietnamese	Asian American	Asian/Pacific Islander
Filipino	Filipino	
Guamanian Hawaiian Samoan Other Pacific Islander	Pacific Islander	
Mexican American	Mexican American	Latino
Central American South American Cuban Puerto Rican Other Latino	Other Latino	
White, Non-Latino	White, Non-Latino	White, Non-Latino
Other No Response Decline to State	Unknown	Unknown

From: http://www.calstate.edu/cim/data-elem-dic/APDB-Transaction-DED.pdf

ED 473545b

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